

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KEITH SANTANGELO,

Plaintiff,

v.

COMCAST CORPORATION,

Defendant.

CIVIL ACTION

District Judge John Z. Lee

Magistrate Judge Young B. Kim

NO.: 1:15-cv-00293

**COMCAST CORPORATION’S [AMENDED UNOPPOSED] MOTION TO FILE UNDER
SEAL ITS REPLY IN SUPPORT OF ITS CROSS-MOTION FOR SUMMARY
JUDGMENT AND RESPONSE TO PLAINTIFF’S COUNTER-STATEMENT OF
ADDITIONAL MATERIAL FACTS**

Defendant Comcast Corporation (“Comcast”), by and through its undersigned attorneys, respectfully moves the Court, pursuant to Rules 5.2 and 7(b) of the Federal Rules of Civil Procedure and Rules 5.8 and 26.2 of the Local Rules of the United States District Court for the Northern District of Illinois, for an Order directing the Clerk of the Court to file under seal, until further order, Comcast’s Reply in Support of its Cross-Motion for Summary Judgment, Response to Plaintiff’s Counter-Statement of Additional Material Facts, and accompanying exhibits (together, the “Summary Judgment Filings”). Plaintiff has confirmed that he has no opposition to this motion.

On May 3, 2016, the Court entered the parties’ Agreed Confidentiality Order, which set forth a “CONFIDENTIAL-SUBJECT TO PROTECTIVE ORDER” designation to protect certain sensitive documents and testimony from disclosure. *See* Agreed Confidentiality Order, Dkt. No. 78 (“**Confidentiality Order**” or “**Order**”). This designation covers the following categories: “(a) information prohibited from disclosure by statute; (b) information that reveals

trade secrets; (c) research, technical, commercial or financial information that the party has maintained as confidential; (d) medical information concerning any individual; (e) personal identity information; (f) income tax returns (including attached schedules and forms), W-2 forms and 1099 forms; (g) personnel or employment records of a person who is not a party to the case; (h) information received in confidence from third parties.” *Id.* ¶ 2. If materials are designated Confidential-Subject to Protective Order, they may not be shared outside of a narrowly defined number of individuals identified in the Order. *Id.* ¶ 5.

Comcast’s Summary Judgment Filings cite to Plaintiff’s deposition testimony, deposition testimony of Comcast’s 30(b)(6) witness, third-party credit reports, and Comcast’s proprietary policies and procedures, which contain trade secret and/or commercial information that Comcast has maintained as confidential.

A public version of the motion with exhibits is being filed along with the sealed motion, and non-redacted copies will be provided to Plaintiff and the Court, pursuant to Paragraph 7 of the Confidentiality Order and Local Rule 6.2.

As such, Comcast respectfully requests that the Court grant Comcast’s Motion to File Under Seal and instruct the Clerk of the Court to keep Comcast’s Reply in Support of its Cross-Motion for Summary Judgment, Response to Plaintiff’s Counter-Statement of Additional Material Facts, and accompanying exhibits under seal.

Dated: June 8, 2018

Respectfully submitted,

/s/ Justin O. Kay

Justin O. Kay (ARDC No. 6286557)

Drinker Biddle & Reath LLP

191 North Wacker Drive, Suite 3700

Chicago, IL 60606-1698

Tel: (312) 569-1000

Fax: (312) 569-3000

Justin.Kay@dbr.com

Seamus C. Duffy (*pro hac vice*)

Michael W. McTigue Jr. (*pro hac vice*)

Meredith C. Slawe (*pro hac vice*)

Drinker Biddle & Reath LLP

One Logan Square, Suite 2000

Philadelphia, PA 19103-6996

Tel: (215) 988-2700

Fax: (215) 988-2757

Seamus.Duffy@dbr.com

Michael.McTigue@dbr.com

Meredith.Slawe@dbr.com

Attorneys for Defendant Comcast Corporation

CERTIFICATE OF SERVICE

I certify that I served a copy of the foregoing document on the following electronically by using the CM/ECF system on this 8th day of June, 2018:

Timothy J. Sostrin
Keogh Law, LTD
55 W. Monroe St., Suite 2290
Chicago, IL 60603
(312) 726-1092
tsostrin@keoghlaw.com

/s/ Justin O. Kay